

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021- -T

IN RE:	Petition of the Office of Regulatory Staff to Revoke Certificates of Public Convenience and Necessity of Certain Motor Carriers For Failure to Maintain and File Evidence of Insurance))))))	PETITION FOR REVOCATION OF CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY OF CERTAIN MOTOR CARRIERS
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The South Carolina Office of Regulatory Staff (“ORS”), by filing this petition, would respectfully show and request of the Public Service Commission of South Carolina (“Commission”):

1. That the Commission is a state agency constituted pursuant to the laws of the State of South Carolina with its business offices located in Columbia, South Carolina; that the Commission is responsible for the regulation of motor vehicle carriers operating for compensation as set forth in S.C. Code Ann. § 58-23-10 *et seq.* (2015 and Supp. 2015); that ORS is charged with the duty to protect the public interest pursuant to S.C. Code Ann. § 58-4-10 *et seq.* (2015 and Supp. 2015).

2. That the companies listed in Exhibit A have been approved by the Commission and certified by ORS to operate as “motor vehicle carriers” as defined in S.C. Code Ann. § 58-23-10(4) (2015) in that they own, control, operate, or manage motor propelled vehicles, not usually operated on or over rails, used in the business of transporting persons or property for compensation over improved public highways in this state.

3. That the companies listed in Exhibit A, each having applied for and having an Order from the Commission to receive a Certificate of Public Convenience and Necessity (“PC&N”) to operate a motor vehicle carrier as defined in S.C. Code Ann. § 58-23-10(4) (2015), have submitted to the jurisdiction of the Commission by holding said Certificate PC&N, and are therefore subject to the jurisdiction of this

Commission pursuant to S.C. Code Ann. § 58-23-1010 *et seq.* (2015 and Supp. 2015). See Exhibit A, Carriers Out of Compliance for Failure to Maintain and File Evidence of Insurance.

4. That the companies listed in Exhibit A, prior to receiving their Certificate PC&N, were each found to be fit, willing and able to operate as a motor carrier by the Commission; from our understanding that in obtaining such authority the companies certified they are “familiar with all statutes and regulations, including safety regulations, governing for-hire motor carrier operations in South Carolina and agree to operate in compliance with these statutes and regulations.” 10 S.C. Code Ann. Regs. 103-133(4)(a) (2012); further, the companies certified they are “aware of the commission's insurance requirements and the costs associated therewith.” 10 S.C. Code Ann. Regs. 103-133(4)(b) (2012).

5. That the Commission requires motor carrier applicants to procure and file with the Commission proper proof of insurance and that the insurance “must be kept in full force and effect and failure to do so is cause for the revocation of the certificate.” S.C. Code Ann. § 58-23-910 (2015).

6. That the companies listed in Exhibit A have failed to file proof of insurance as required by S.C. Code Ann. § 58-23-910 (2015) and 10 S.C. Code Ann. Regs. 103-171 and/or 103-174 (2012). See Exhibit B, Affidavit of Carole Chauvin.

7. That ORS notified the companies listed in Exhibit A of their failure to file the required documents providing evidence of insurance; that despite this notification, the listed companies have continued to fail to comply with the requirements of providing evidence of insurance.

8. That “[a] failure to file evidence of insurance, self-insurance or surety bond shall be just cause for the commission, without further evidence or hearing, to suspend its order granting authority or to suspend the certificate or any license issued to the motor carrier. A failure to keep all insurance, self-insurance, or surety bond in full force and effect shall result in automatic suspension, upon receipt of an affidavit from the ORS with supporting evidence, of the commission’s order granting authority, the certificate, and any license issued to the motor carrier...” 10 S.C. Code Ann. Regs. 103-175 (2012); further, that “the [insurance] policy, [surety] bond or certificate of self-insurance...must be kept in full force

and effect and failure to do so is cause for the revocation of the certificate.” S.C. Code Ann. § 58-23-910 (2015).

9. That “[t]he commission may at any time, after notice and opportunity to be heard, suspend, revoke, alter, or amend any certificate, if it shall be made to appear that the holder has willfully violated or refused to observe orders, rules, or regulations prescribed by the commission, provisions of the Motor Vehicle Carrier Law, or any other law of this State regulating motor carriers for hire and applicable to the holder of such certificate, or, if, in the opinion of the commission, the motor carrier holding a Certificate of PC&N is not furnishing adequate service or it is no longer compatible with the public interest to continue said certificate in force, or, if in the opinion of the commission, the motor carrier holding a Certificate of FWA is no longer furnishing adequate service, or said carrier no longer meets the fit, willing, and able criteria....” 10 S.C. Code Ann. Regs. 103-240 (2012).

10. That “[t]he commission may, after a hearing, order the suspension, revocation, alteration, or amendment of any certificate issued pursuant to Articles 1 through 11 of this chapter, if it is proved that the holder of the certificate wilfully made any misrepresentation of a material fact in obtaining his certificate or wilfully violated or refused to observe the laws of this State touching motor vehicle carriers or wilfully violated any of the terms of his certificate or of the commission's proper orders, rules or regulations. But the holder of the certificate has the right of appeal to any court of competent jurisdiction. The commission must not be a party to any appeal.” S.C. Code Ann. § 58-23-320 (2015).

11. That the information listed in Exhibit A is the mailing address for each carrier on file with the Commission and ORS and the information listed in Exhibit A was provided by each carrier listed in Exhibit A. See Exhibit A, Carriers Out of Compliance for Failure to Maintain and File Evidence of Insurance. See Exhibit B, Affidavit of Carole Chauvin.

WHEREFORE, ORS respectfully requests that the Honorable Commission:

1. Provide for the opportunity by the carrier to respond to the allegations of this Petition within (30) days from the date of receipt of this Petition.

2. Schedule and conduct a formal administrative hearing as soon as practicable to address disputed issues of fact and law regarding the Certificates of PC&N of the carriers listed in Exhibit A, which ORS seeks to have revoked by the Commission in this action pursuant to 10 S.C. Code Ann. Regs. 103-175 and 103-240 (2012) and S.C. Code Ann. § 58-23-320 (2015);
3. Following the formal administrative hearing, immediately rule to revoke the Certificates of those motor carriers listed in Exhibit A in accordance with the authority provided to the Commission under 10 S.C. Code Ann. Regs. 103-240 (2012) and S.C. Code Ann. § 58-23-320 (2015) and thereafter immediately enter a final Order; and,
4. For other appropriate action which the Commission may deem necessary.

s/ C. Lessie Hammonds
C. Lessie Hammonds, Esquire
South Carolina Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
Phone: (803)737-0800
Fax: (803)737-0895
Email: lhammonds@ors.sc.gov

March 2, 2021
Columbia, South Carolina

Exhibit A - Carriers Out of Compliance for Failure to Maintain and File Evidence of Insurance

Date: March 2, 2021

Docket No. _____

EXHIBIT A

Page 1 of 3

No.	Docket No	Cert Type	NAME	DBA	ADDRESS	CITY	State	ZipCode
1	2018-253-T	Class C Charter	1st Class Limousine NJ LLC		1507 Westchase Dr	Charleston	SC	29407
2	2018-190-T	Class C Charter	AA Coastal Transportation of SC, LLC		3887 Stillwood Dr	Myrtle Beach	SC	29588
3	2018-351-T	Class C Charter Bus	AA Coastal Transportation of SC, LLC		3887 Stillwood Dr	Myrtle Beach	SC	29588
4	1998-574-T	Class C Taxi	AAA A-1 Airport Limo Shuttle, LLC		PO Box 60489	N Charleston	SC	29419
5	2006-361-T	Class C Charter Bus	AAA A-1 Airport Limo Shuttle, LLC		PO Box 60489	N Charleston	SC	29419
6	2018-377-T	Class C Charter	Affordable Transportation Service of SC LLC		527 Tea Rose Dr	Boiling Springs	SC	29316
7	2015-319-T	Class C Non-Emer	AMS of West Columbia, Inc.	AMS	210 N 9th St	W Columbia	SC	29169
8	2012-349-T	Class C Taxi	Apple Express Transportation, LLC		PO Box 1600	Mt. Pleasant	SC	29464
9	1997-261-T	Class E HHG	Atlantic Transfer & Storage Co., Inc.		7370-B East Spartan Blvd	N Charleston	SC	29418
10	2014-123-T	Class C Non-Emer	Belmont Luxury Home Care LLC		1706 Camden Rd	Holly Hill	SC	29059
11	2008-351-T	Class C Charter	Big A Auto Sales Lot 2, LLC	Gold Star Limousine Service	1216 N Cashua Dr	Florence	SC	29501
12	2017-46-T	Class C Taxi	Blue Bird Transportation, LLC		1800 William Kennerty Dr Apt 11-D	Charleston	SC	29407
13	2018-298-T	Class C Taxi	Brenda Pendergrass	BP Taxi	2453 Gallowaytown Rd	Hartsville	SC	29550
14	1998-523-T	Class C Charter Bus	Brooks Transit Charter Service, Inc.		2629 Flamingo Drive	Columbia	SC	29209
15	2017-100-T	Class C Charter Bus	BTL Unlimited LLC		235 Manatee Rd	Holly Hill	SC	29059
16	2004-171-T	Class C Charter Bus	C & F Charter Service, LLC		PO Box 42	Tillman	SC	29943
17	1999-20-T	Class C Charter	Carolina Chauffeured Service, LLC		2903 Glenarden Dr	Charleston	SC	29414
18	2014-373-T	Class C Taxi	Carolina Express I LLC		1601 Longcreek Dr #172	Columbia	SC	29210
19	2007-81-T	Class C Charter Bus	Carolyn Lee	Leeway Travel	PO Box 73	Estill	SC	29918
20	2018-250-T	Class C Charter	Casper Rides LLC		111 Brockman Dr	Mauldin	SC	29662
21	2013-369-T	Class C Taxi	Charleston City Transportation L.L.C.		2459 Lantern St	Charleston	SC	29414
22	2007-434-T	Class C Taxi	City Taxi, LLC		219 Longmont Dr	Lexington	SC	29072
23	2018-273-T	Class C Charter	Classic Choice Limo LLC		587 Yellow Leaf Ln	Summerville	SC	29486
24	2016-151-T	Class C Charter Bus	Coffield's Charter and Tour, LLC		7419 Powell Rd	Georgetown	SC	29440
25	2014-296-T	Class C Charter Bus	Columbia Brew Bus LLC		1004 C Ave	W Columbia	SC	29169
26	2018-391-T	Class C Charter	Crowned One Limo & Transportation LLC		138 Adthan Circle	Goose Creek	SC	29445
27	2019-265-T	Class C Non-Emer	Darrick Campbell	Derrions Transportation	237 Laurel Ln Lot 2	Florence	SC	29506
28	2003-173-T	Class C Taxi	David Lee Lesesne		1121 Hurley Dr	Sumter	SC	29150
29	2007-84-T	Class C Taxi	DJ's Transportation, LLC		116 Fairhaven Dr	Goose Creek	SC	29445
30	2017-377-T	Class C Non-Emer	East Coast Electronics LLC	ECE	14 E Butler Rd Ste A	Mauldin	SC	29662
31	2011-290-T	Class C Non-Emer	Eddie's Take You There Service, LLC		2112 Ozelma Dr	Dillon	SC	29536
32	2016-229-T	Class C Non-Emer	El Shaddai Medical Transportation Services, LLC		2308 Timberlane Dr	Florence	SC	29506
33	2015-189-T	Class C Charter Bus	Emerald Tours Inc. LLC		PO Box 4661	Columbia	SC	29240
34	2018-282-T	Class C Charter	Encore 2K, LLC	Tiger Tail Tuktuk	519 College Ave # 1603	Clemson	SC	29633
35	2015-315-T	Class C Taxi	Ervin Parker		624 Middleberg Way	Florence	SC	29505
36	2009-146-T	Class C Charter Bus	Ethel P. Isaac	Unistyle PCL Tours	PO Box 113	Lynchburg	SC	29080
37	2012-281-T	Class C Charter Bus	Express Transportation, Inc.		9572 Sidney Hayes Rd Ste 103	Orlando	FL	32824
38	2017-329-T	Class C Charter	Exquisite Ground Transportation, SE		7320 Broad River Rd Ste K-260	Irmo	SC	29063
39	2017-360-T	Class C Non-Emer	F & S Transportation, LLC		14 Lancer Ct.	Columbia	SC	29203
40	2010-152-T	Class C Charter	First Class Limo Service, LLC		108 Chason Hill Ct	Lexington	SC	29073
41	2017-111-T	Class C Charter	Fox Coach Transportation Services LLC		4920 McPhail St	Dalzell	SC	29040
42	2019-172-T	Class C Taxi	Frogtown Enterprises, LLC	Frogtown Taxi	7168 Ethel Post Office Rd	Meggett	SC	29449
43	2015-206-T	Class C Taxi	Gary Mixson	Steadfast Taxi	203 Berry St	Barnwell	SC	29812
44	2003-232-T	Class C Charter Bus	Getaway Travels & Tours, LLC		PO Box 2669	Orangeburg	SC	29116
45	2004-295-T	Class C Taxi	Gilbert O. Kalu	Budget Cab Company	PO Box 1314	Greenville	SC	29602
46	2018-393-T	Class C Non-Emer	Grateful med transportation llc		21 Oaks Plantation Rd	St. Helena Island	SC	29920
47	2017-224-T	Class C Non-Emer	Gregory Jenkins Trucking, LLC	G & G Transportation	PO Box 187	Scranton	SC	29591
48	2019-69-T	Class C Non-Emer	Holman Tri-County Transportation LLC		1125 Elm St W	Hampton	SC	29924

Exhibit A - Carriers Out of Compliance for Failure to Maintain and File Evidence of Insurance

Date: March 2, 2021

Docket No. _____

EXHIBIT A

Page 2 of 3

No.	Docket No	Cert Type	NAME	DBA	ADDRESS	CITY	State	ZipCode
49	2019-87-T	Class C Charter	J & L Enterprise Limo LLC		142 Farm Chase Dr	Lexington	SC	29073
50	2006-149-T	Class C Charter	J. E. Place		PO Box 583	Sullivan's Island	SC	29482
51	2019-36-T	Class C Taxi	Jafar Parker		624 Middleberg Way	Florence	SC	29505
52	2018-63-T	Class C Charter	James Jones	Jones & Son Limo Transportation	1374 Rifle Range Rd	Mt Pleasant	SC	29464
53	2013-226-T	Class C Charter	James Kostarelos	19th Hole Shuttle and Limo Service	400 Ladykirk Ln	Myrtle Beach	SC	29579
54	2016-213-T	Class C Charter	Jerome Singleton	Executives Transportation Services	1014 W Shady Grove Rd	Irmo	SC	29063
55	2000-141-T	Class E HHG	Jimmy Coats	Greenwood Moving & Storage	PO Box 1261	Greenwood	SC	29648
56	2009-397-T	Class E HHG	JMS Worldwide, LLC		4257 Domino Ave	N Charleston	SC	29405
57	2002-399-T	Class C Taxi	John F. Wilder		638 W Oakland Ave	Sumter	SC	29150
58	2019-350-T	Class C Charter Bus	Jordan Tours LLC		151 Kasper Ln	Aiken	SC	29803
59	2013-439-T	Class C Taxi	Jus In Time Taxi & Limo LLC		2698 Cainhoy Rd	Huger	SC	29450
60	2015-121-T	Class C Taxi	Kenneth Lee Johnson	Kenneth's Taxi	736 Meetinghouse Rd	Hopkins	SC	29061
61	2011-500-T	Class C Taxi	KP of Camden, LLC	SC Palmetto Taxi	70 Edinburgh Castle Ln	Camden	SC	29020
62	2005-89-T	Class C Charter Bus	Leon Robinson	Robbie's Charter	141 Meadowlake Dr	Columbia	SC	29203
63	2016-410-T	Class C Non-Emer	LIL Services LLC		209 Northcliff Way	Greenville	SC	29617
64	2019-310-T	Class C Non-Emer	Marrakesch, Inc.	MDL Transportation	406 Barnwell NW Ave Ste B	Aiken	SC	29801
65	2012-354-T	Class C Non-Emer	MedEXpress, LLC		597 Old Mount Holly Rd Ste 203-C	Goose Creek	SC	29445
66	2019-23-T	Class C Non-Emer	Michael Boatwright	Boatwright's Transport	2065 Coreys Ct	Dillon	SC	29536
67	2016-265-T	Class C Non-Emer	MSK Transportation LLC		889 N Matthews Rd Bldg 881 Apt C2	Lake City	SC	29560
68	2014-476-T	Class C Stretcher Van	On Time Transit LLC II		1161 Red Hill Rd	Camden	SC	29020
69	2012-285-T	Class C Non-Emer	On Time Transit LLC II		1161 Red Hill Rd	Camden	SC	29020
70	2017-196-T	Class C Non-Emer	Out & About LLC		405 Mockingbird Ln	Spartanburg	SC	29307
71	2015-60-T	Class C Non-Emer	Paulette On Board Transportation Services, LLC		2870 Dock Rd	Sumter	SC	29153
72	2012-370-T	Class C Charter Bus	Pee Dee Community Fellowship Church		PO Box 12256	Florence	SC	29504
73	2014-381-T	Class C Charter	Peter J. Gueldner	Executive Limousine of SC	8805 Whippoorwill Ln	Indian Land	SC	29707
74	2001-274-T	Class C Taxi	Peter Singleton	Peter & Annette Limo Service	113 Tuscany Ct	Ladson	SC	29456
75	2013-128-T	Class C Charter	Prestige Limousine Service, LLC		2740 Jamestown Road	Camden	SC	29020
76	2010-133-T	Class C Non-Emer	Renew Transportation LP		109 Midwood Rd	Travelers Rest	SC	29690
77	2007-105-T	Class C Charter Bus	Ritz Limousine and Entertainment Club, Inc.		9553 Edgerton Dr D-11	Myrtle Beach	SC	29572
78	2014-279-T	Class C Charter Bus	Rivers Charter & Tours LLC		PO Box 3366	W Columbia	SC	29171
79	2014-448-T	Class C Taxi	Rowland Senior Services, LLC		25 Maplewood Dr	Sumter	SC	29150
80	2011-292-T	Class C Taxi	Royal Cabs, LLC		4685 Fish Hatchery Rd	Gaston	SC	29053
81	2017-80-T	Class C Non-Emer	Royalty on Board Transportation LLC		367 Langfordville Rd	Ridgeland	SC	29936
82	1994-503-T	Class C Taxi	Rudolph A. Bradley		PO Box 2139	Georgetown	SC	29442
83	2004-92-T	Class C Charter Bus	Saleeby Enterprises LLC		105 Paula Court	Conway	SC	29526
84	2000-374-T	Class C Charter	Sandra Collins	King and Queens Choice Limousine Service	37 Briarcliff Dr	Charleston	SC	29407
85	2014-444-T	Class C Charter	SBL Investments, LLC	SB Limousine Service	6570 St Peters Church Rd	Myrtle Beach	SC	29588
86	2004-313-T	Class C Charter	Starlean Green	Green Transportation Service	218 Byrd Lane	Florence	SC	29506
87	2019-75-T	Class C Stretcher Van	Stephen Coomes	Coomes Non Emergency Medical Transport	2833 Vineyards Creek Church Rd	Comer	GA	30629
88	2018-300-T	Class C Non-Emer	Stephen Coomes	Coomes Non Emergency Medical Transport	2833 Vineyards Creek Church Rd	Comer	GA	30629
89	2019-245-T	Class C Charter	Style MB LLC	Ride in Style	129 Coachman Ln	Surfside Beach	SC	29575
90	2020-82-T	Class C Non-Emer	TDK Transporting LLC		23 Benjamin Smalls Rd	Seabrook	SC	29940
91	2016-163-T	Class C Charter Bus	The Charleston Bus, LLC		1308 E Montague Ave	N Charleston	SC	29405
92	2010-150-T	Class C Charter Bus	The Star Ship, Inc.		203 Flamingo Dr	Clayton	NC	27520
93	2018-118-T	Class C Non-Emer	Time To Move LLC		PO Box 3552	Aiken	SC	29802
94	2018-117-T	Class C Stretcher Van	Time To Move LLC		PO Box 3552	Aiken	SC	29802
95	2020-111-T	Class C Non-Emer	Trav-all Transit LLC		4155 Gaines Mill Dr	N Charleston	SC	29420
96	2011-25-T	Class C Taxi	V.I.P. Transportation, LLC		1643-B Savannah Hwy Ste 375	Charleston	SC	29407

Exhibit A - Carriers Out of Compliance for Failure to Maintain and File Evidence of Insurance

Date: March 2, 2021

Docket No. _____

EXHIBIT A

Page 3 of 3

No.	Docket No	Cert Type	NAME	DBA	ADDRESS	CITY	State	ZipCode
97	2015-168-T	Class C Non-Emer	Valerie Wallace	Total Care Transportation	13401 Old McColl Rd	Gibson	NC	28343
98	2019-237-T	Class C Charter Bus	Williamsburg Tours LLC		462 Camelia Ln	Lake City	SC	29560
99	2014-48-T	Class C Taxi	Yellow Top Taxi LLC		867 Colony Dr #115	Charleston	SC	29407

EXHIBIT B**BEFORE****THE PUBLIC SERVICE COMMISSION****OF SOUTH CAROLINA****DOCKET NO. _____****March 2, 2021**

IN RE: Petition of the Office of Regulatory Staff to Revoke
Certificates of Public Convenience and Necessity of
Certain Motor Carriers for Failure to Maintain and
File Evidence of Insurance

AFFIDAVIT OF
CAROLE CHAUVIN

The Affiant, after having been first duly sworn, deposes and states as follows:

- 1) My name is Carole Chauvin and I am employed by the Office of Regulatory Staff ("ORS") as a Program Specialist for the Transportation Department.
- 2) My office is located at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201.
- 3) My duties and responsibilities as a Program Specialist for ORS include serving as custodian of records for business filings associated with motor vehicle carriers subject to the jurisdiction of the Public Service Commission ("PSC").
- 4) It is the regular business practice of ORS to maintain certain business records required to be filed by motor vehicle carriers that are subject to the jurisdiction of the PSC.
- 5) As a result of my duties and responsibilities, I have knowledge of the manner in which the books and records are kept and of any books or records which are not complete or which are not on file with ORS.
- 6) On **March 2, 2021**, I examined the business records on file with ORS.
- 7) As a result of that examination, I attest that the proof of insurance as required by 10 S.C. Code Ann. Regs. 103-171 and/or 103-174 (2012) has not been filed with ORS by the following carriers as of 11:59 pm on **March 1, 2021**: (See attached list)

AND FURTHER THE AFFIANT SAYETH NOT.

Carole Chauvin

Carole Chauvin
Program Specialist, Transportation Department
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, S.C. 29201

Sworn and subscribed before me
this 2nd day of March, 20 21

Victoria L Watts

Notary Public for South Carolina

My Commission Expires: 10/16/23